

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,

Case No. 21-cr-108(PAM/TNL)

Plaintiff,

v.

MOTION IN LIMINE
TO STRIKE SURPLUSAGE

Thomas Lane,

Defendant.

The Defendant Thomas Lane, through his counsel Earl Gray, moves the Court to strike the surplusage “He began working as an MPD officer in December 2019” as prejudicial and unnecessary to charge the Defendant with Count 3. The language gives a false portrayal of the Defendant Thomas Lane’s employment by not telling the whole story. The true whole story is Thomas Lane was sworn in as a police officer RECRUIT on December 10, 2020, however not until May 21, 2020, was he not a RECRUIT. Being a RECRUIT meant he was always with a field training officer and could not make decisions on his own.

Dated this 30th day of December, 2021.

s/Earl P. Gray
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